UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (CGM)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

v.

FREDERIC Z. KONIGSBERG, SUSAN M. KONIGSBERG, BRADERMAK, LTD., BRADERMAK EQUITIES CORP., LEE RAUTENBERG, JAN STAHL, GERI STAHL, H. PETER STEIL, APO HEALTH, INC. PSP F/B/O H. PETER STEIL, APO HEALTH, INC. PSP F/B/O JAN STAHL, BUYER'S ALTERNATIVES, INC. PSP F/B/O JAN STAHL, and PJS TRADING, INC. PSP F/B/O JAN STAHL

Defendants.

Adv. Pro. No. 10-04394 (CGM)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation

Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order ("Case Management Procedures Order").

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including August 13, 2021.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[THIS PORTION IS INTENTIONALLY LEFT BLANK]

Dated: April 29, 2021 New York, New York

BAKER & HOSTETLER LLP

By: /s/ Robertson D. Beckerlegge

45 Rockefeller Plaza

New York, New York 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Robertson D. Beckerlegge

Email: rbeckerlegge@bakerlaw.com

Robyn M. Feldstein

Email: rfeldstein@bakerlaw.com

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff

BERNFELD, DEMATTEO & BERNFELD LLP

By: <u>/s/ David Bernfeld</u> 600 Third Avenue

New York, New York 10016 Telephone: 212.661.1661 Facsimile: 212.557.9610 David B. Bernfeld

Email: davidbernfeld@bernfeld-dematteo.com

Jeffrey L. Bernfeld

Email: jeffreybernfeld@bernfeld-dematteo.com

Attorneys for Defendants Frederic Z. Konigsberg, Susan M. Konigsberg, Bradermak, Ltd., Bradermak Equities Corp., Lee Rautenberg

/s/ Deborah A. Reperowitz
Deborah A. Reperowitz, Mediator